

EXHIBIT “A”

SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, P.C.

By: Stuart A. Tucker, Esq., NJAID# 047561991

A Professional Corporation

Quakerbridge Executive Center

101 Grovers Mill Road, Suite 200

Lawrenceville, New Jersey 08648

T: 609-275-0400, F: 609-275-4511

Attorneys for Plaintiff, Sophia Caver

SOPHIA CAVER

Plaintiff,

vs.

ROSS STORES, INC. d/b/a DD'S DISCOUNTS, et
al,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – MERCER COUNTY

DOCKET NO: MER-L-1472-21

Civil Action

SUMMONS

THE STATE OF NEW JERSEY TO THE ABOVE NAMED DEFENDANTS

ROSS STORES, INC. d/b/a DD'S DISCOUNTS

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. A list of each deputy clerk of the Superior Court is also provided). If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, PO Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey, and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your

rights; you must file and serve a written answer or motion (with fee of \$175 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and cost of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Service office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. A list of these numbers is also provided.

Dated: **July 16, 2021**

S/ MICHELLE M. SMITH
MICHELLE M. SMITH, CLERK, SUP.CT.

Name of Defendant to be served:	Ross Stores, Inc. d/b/a DD's Discounts
Address for Service:	c/o Registered Agent
	The Corporation Trust Company
	820 Bear Tavern Road
	West Trenton , NJ 08628

Following is a listing of county bar associations that offer lawyer referral services. Locate your county of residence and contact the appropriate service. Do not contact referral services that are outside of your local county.

Atlantic County Bar Association

1201 Bacharach Boulevard
Atlantic City, NJ 08401
609-345-3444
tamara.lamb@atcobar.org
www.atcobar.org
Tamara Lamb, Executive Director

Bergen County Bar Association

15 Bergen Street
Hackensack, NJ 07601
201-488-0044
www.bergenbar.org
Frank O'Marra Jr., Executive Director

Burlington County Bar Association

137 High Street, 3rd Floor
Mount Holly, NJ 08060
609-261-4862 or 609-261-4863
bcba@burlcobar.org
www.burlcobar.org
Kara E. Edens, Executive Director

Camden County Bar Association

1040 North Kings Highway, Suite 201
Cherry Hill, NJ 08034
856-482-0618
www.camdencountybar.org
Laurence B. Pelletier, Executive Director

Cape May County Bar Association

9 North Main Street
Cape May Courthouse, NJ 08210
609-463-0313
cmcba.ed@gmail.com
Pamela M. Kaitern, Executive Director

Cumberland County Bar Association

PO Box 2374
Vineland, NJ 08362
856-696-5550
ccba@ccnjbar.org
www.ccnjbar.org
Carol Walker, Executive Director

Essex County Bar Association

470 Martin Luther King Jr. Boulevard
Newark, NJ 07102
973-622-6204
info@essexbar.com
www.essexbar.com
Wendy E. Deer, Executive Director

Gloucester County Bar Association

PO Box 338
Woodbury, NJ 08096
856-848-4589
baroffice@gcbanj.org
www.gcbanj.org
Lynn Silverstein, Executive Director

Hudson County Bar Association

583 Newark Avenue
Jersey City, NJ 07306
201-798-4708
www.hcbalaw.com
Lisa Burke, Executive Director

Hunterdon County Bar Association

PO Box 573
Annandale, NJ 08801
908-200-7822
hcba@comcast.net
www.huntcolaw.org
Lyn Brokaw, Executive Director

Mercer County Bar Association

1245 White Horse Mercerville Road, Suite 420
Mercerville, NJ 08619
609-585-6200
siraca@mercerbar.com
www.mercerbar.com
Samantha Iraca, Executive Director

Middlesex County Bar Association

87 Bayard Street
New Brunswick, NJ 08901
732-828-0053 ext. 100
admin@mcbalaw.com
www.mcbalaw.com
Jonathan P. Cowles, Executive Director

Monmouth Bar Association

Monmouth County Court House
Freehold, NJ 07728
732-431-5544
tmaciewicz.monmouthbar@verizon.net
www.monmouthbarassociation.com
Tracy A. Settupane, Executive Director

Morris County Bar Association

245 South Street
Morristown, NJ 07960
973-267-6089
yperez@morriscountybar.com
www.morriscountybar.com
Nancy M. Bangiola, Executive Director

Ocean County Bar Association

PO Box 381
Toms River, NJ 08754
732-240-3666
karin@oceancountyba.com
www.oceancountybar.org
Karin Poola, Executive Director

Passaic County Bar Association

401 Grand Street, 3rd Floor
Paterson, NJ 07505
973-345-4585
www.passaicbar.org
Karen A. Corsi, Executive Director

Salem County Bar Association

856-935-5629
contact@salemcountybar.org
www.salemcountybar.org

Somerset County Bar Association

20 North Bridge Street HCH 325
Somerville, NJ 08876
908-685-2323
director@somersetbar.com
www.somersetbar.com
Elvia Viera, Executive Director

Sussex County Bar Association

61 Spring Street, 4th Floor
Newton, NJ 07860
973-383-3900
info@SussexCtyBarAssoc.com
www.sussexcountybar.com

Union County Bar Association

2 Broad Street 1st Floor
Elizabeth, NJ 07207
908-353-4715
www.uclaw.com
Jeffrey M. Clar, Executive Director

Warren County Bar Association

413 Second Street
Belvidere, NJ 07823
908-387-1835
info@warrencountybar.org
www.warrencountybar.org
Courtney Donah, Executive Director

STATEWIDE

American Civil Liberties Union of N.J. (ACLU-NJ)

P.O. Box 32159, Newark 07102
(973) 642-2084; Fax: (973) 642-6253
intake@aclu-nj.org; www.aclu-nj.org
Exec. Dir.: Amol Sinha
Legal Dir.: Jeanne LoCicero

Community Health Law Project

Administrative Office
185 Valley St., South Orange 07079
(973) 275-1175; Fax: (973) 275-5210; TTY: (973) 275-1721 chlpinfo@chlp.org;
www.chlp.org

President/Exec. Dir.: Harold Garwin

Disability Rights New Jersey (DRNJ)

210 S. Broad St., 3rd Floor, Trenton 08608
(609) 292-9742; Toll-free (in-state only): (800) 922-7233;
TTY: (609) 633-7106; Fax: (609) 777-0187
advocate@drnj.org; www.dmj.org

Exec. Dir.: Gwen Orlowski

Legal Dir.: Susan Saidel

Legal Advocacy for People with Disabilities

Formerly New Jersey Protection and Advocacy, Inc.

Education Law Center

60 Park Pl., Suite 300, Newark 07102
(973) 624-1815; TTY: (973) 624-4618; Fax: (973) 624-7339
elc@edlawcenter.org; www.edlawcenter.org
Exec. Dir.: David Sciarra; dsciarra@edlawcenter.org
Managing Dir.: Theresa Luhm; tluhm@edlawcenter.org
Senior Atty.: Elizabeth Athos; eathos@edlawcenter.org
Atty.: Jessica Levin; jlevin@edlawcenter.org
Dir. of Secondary Reform: Stan Karp; skarp@edlawcenter.org
Policy & Outreach Dir.: Sharon Krengel; skrengel@edlawcenter.org
Intake Coordinator: Aimee Roche; aroche@edlawcenter.org
Research Dir.: Danielle Farrie; dfarrie@edlawcenter.org
Receptionist: Diane Gayoso; dgayoso@edlawcenter.org
Education matters

Legal Services of New Jersey, Inc.

100 Metroplex Dr. at Plainfield Ave., Suite 402,
P.O. Box 1357, Edison 08818-1357
(732) 572-9100; Fax: (732) 572-0066 lsnj@lsnj.org; www.lsnj.org
President and General Counsel: Melville D. Miller, Jr.
Exec. V.P. and Asst. General Counsel: Dawn K. Miller
Sr. V.P.: Claudine M. Langrin

N.J. Department of the Treasury

Division of Administration
Special Administrative Services, 50 W. State St.,
P.O. Box 211, Trenton 08625-0211 (609) 292-6262

National Legal Aid & Defender Assn. (NLADA)

Washington Office
1901 Pennsylvania Ave., Suite 500, Washington, DC 20036
(202) 452-0620; Fax: (202) 872-1031
info@nlada.org; www.nlada.org
President/C.E.O.: Jo-Ann Wallace; j.wallace@nlada.org
Civil and Defender Law

New Jersey Protection and Advocacy, Inc.

See Disability Rights New Jersey (DRNJ)

Pro Bono Partnership

300 Lanidex Plz., Suite 3203, Parsippany 07054
(973) 240-6955; Fax: (973) 240-6966
www.probonopartner.org
Exec. Dir.: Nancy C. Eberhardt
Program Dir.: Christine Michelle Duffy
Senior Staff Atty.: Kent E. Hansen
khansen@probonopartner.org
Staff Atty.: Alexandra E. Kilduff

*A legal services provider and resource center that matches volunteer attorneys
with nonprofit organizations requesting legal assistance.
Also serves New York and Connecticut*

ATLANTIC COUNTY

Community Health Law Project

Atlantic, Camden, Cape May, Cumberland, Gloucester & Salem Counties
See Camden County

South Jersey Legal Services Inc.

1300 Atlantic Ave., Mezzanine Floor, Atlantic City 08401
(609) 348-4200, Ext. 6350; Fax: (609) 345-6919
Managing Atty.: James M. McClain, Ext. 6311; jmccclain@lsnj.org
Senior Atty.: Mitchell Moskowitz (Consumer Law)
Ext. 6318; mmoskovitz@lsnj.org
Staff Attys.:

Benjamin Fidalgo, Ext. 6272; bfidalgo@lsnj.org

Alexander Hersonski, Ext. 6326; ahersonski@lsnj.org

Sheila Hughes, Ext. 6313; shughes@lsnn.org

Katelyn E. McKenzie, Ext. 6329; kmckenzie@lsnj.org

Poverty Law

BERGEN COUNTY

Bergen County Community Mental Health Law Project

One Bergen County Plz., 4th Floor, Hackensack 07601
(201) 634-2762, 61; Fax: (201) 336-6089
Project Dir.: Melissa H. DeBartolo
Staff Attys.: Kelly A. Durkin; Marianne B. Ortega
*Mental Health, Social Security Disability, Family Law, Housing Advocacy and
Other Entitlements*

Northeast New Jersey Legal Services

Bergen County Division
190 Moore St., 1st Floor, Hackensack 07601
(201) 487-2166; Fax: (201) 487-3513
njls@lsnj.org
Exec. Dir.: John H. Fitzgerald; jfitzgerald@lsnj.org
Civil

BURLINGTON COUNTY

Community Health Law Project - Mercer & Burlington Counties

See Mercer County

South Jersey Legal Services, Inc.

107 High St., Mount Holly 08060
(609) 261-1088; Fax: (609) 267-7812
Managing Atty.: Maria Born, Ext. 6726; mborn@lsnj.org
Staff Attys.
R. Adam Bethke; rbethke@lsnj.org
Fana Wray Hopkins, Ext. 6433; fwrayhopkins@lsnj.org
Thomas LaMaina, Ext. 6725; tlamaina@lsnj.org
Christopher Vanette, Ext. 6722; cvanette@lsnj.org

CAMDEN COUNTY

Community Health Law Project

Atlantic, Camden, Cape May, Cumberland, Gloucester & Salem Counties
Station House Office Bldg., Suite 400, 900 Haddon Ave., Collingswood 08108
(856) 858-9500; Fax: (856) 858-9545; TTY: (856) 858-9500
collingswood@chlp.org
Managing Atty.: Brian G. Smith
Also serves counties of Atlantic, Cape May, Cumberland, Gloucester, Salem
Civil legal services for indigent disabled.

South Jersey Legal Services, Inc.

Administrative Offices
745 Market St., 2nd Floor, Camden 08102
(856) 964-2010; Fax: (856) 964-0228; TDD (856) 964-1204
Sils.camden@lsnj.org
Exec. Dir.: Douglas E. Gershuny, Ext. 6209; dgersuny@lsnj.org
Deputy Dir.: Ann M. Gorman, Ext. 6258; agorman@lsnj.org
Dir. Of Pro Bono Service: Michelle T. Nuciglio, Ext. 6229; mnuciglio@lsnj.org
Dir. Of Litigation & Advocacy: Kenneth M. Goldman, Ext. 6330;
kgoldman@lsnj.org
*Family Public Entitlements, Community 0228, Economic Development, Elder
Law, Housing, Community Legal Education & Consumer Law*

Continued on next page

South Jersey Legal Services, Inc. – Continued**Centralized Intake Unit**

745 Market St., Camden 08102
 (856) 964-9400; Fax (856) 964-9415; Client Intake: (800) 496-4570
 Managing Atty.: Richard Chiumento, Ext. 6831; rchiumento@lsnj.org

Camden County Neighborhood Office

745 Market St., Camden 08102
 (856) 964-2010; Fax: (856) 338-9227
 Managing Attys:
 John Pendergast, Ext. 6208; jppendergast@lsnj.org
 Olga Pomar (Housing Preservation & Community Development Coordinator)
 Ext. 6232; opomar@lsnj.org
 Senior Atty.: Sonia Bell (Housing), Ext. 6270 - sbell@lsnj.org
 Staff Attys.:

Jakai Jackson; jjackson@lsnj.org
 Alan Lesso, Ext. 6236; aless@lsnj.org
 Nessa Limbers, Ext. 6443; nlimbers@lsnj.org
 Sandra Passaro, Ext. 6268; spassaro@lsnj.org
 Abigail Sullivan, Ext. 6221; asullivan@lsnj.org

Senior Citizens Advocate Center

745 Market St., Camden 08102-1117
 (856) 964-2010; Fax: (856) 338-9227; TDD: (856) 964-1204
 Atty.: Lynda Yamamoto, Ext. 6227; lyamamoto@lsnj.org

CAPE MAY COUNTY**Community Health Law Project**

Atlantic, Camden, Cape May, Cumberland, Gloucester & Salem Counties
See Camden County

South Jersey Legal Services, Inc.

1261 Route 9, P.O. Box 785, Cape May Court House 08210
 (609) 465-3001; Fax: (609) 465-9018
 Managing Atty.: Elizabeth Cunningham, Ext. 6613; ecunningham@lsnj.org
 Staff Attys.:

Michelle Altenpohl, Ext. 6619; maltenpohl@lsnj.org

Kathleen Carson Smith; kcarson@lsnj.org

Poverty Law

CUMBERLAND COUNTY**Community Health Law Project**

Atlantic, Camden, Cape May, Cumberland, Gloucester & Salem Counties
See Camden County

South Jersey Legal Services, Inc.

415 W. Landis Ave., 2nd Floor, Vineland 08360
 (856) 691-0494; Fax: (856) 691-5072
 Managing Atty: Ashley Courtney, Ext. 6437, acourtney@lsnj.org
 Staff Attys.:

Harry Chung; hehung@lsnj.org

John Corcoran; jcorcoran@lsnj.org

Jennifer R. Perex, Ext. 6429; jperex@lsnj.org

Lindsey Procida, Ext. 6433; lprocida@lsnj.org

Also serves counties of Salem

Workers' rights (Statewide)

ESSEX COUNTY**Community Health Law Project**

Essex & Passaic Counties
 650 Bloomfield Ave. Suite 210, Bloomfield 07003
 (973) 680-5599; Fax: (973) 680-1488; TTY: (973) 680-1116
 Managing Atty.: Alma Yee

Also serves county of Passaic

Essex County Legal Aid Association

Hall of Records, Room 118,
 465 Dr. Martin Luther King Jr. Blvd., Newark 07102
 (973) 622-0063; Fax: (973) 622-2699
www.eclaan.org

Exec. Dir.: Yvette Gibbons

Supervising Atty.: Ingrid Enriquez

Attys.:

Debra Cannella

Gladys Moriarty

Client Services Specialist: Marie Roque

Fund Raising/Development Dir.: Robert M. Adler (908) 672-0738

Civil; Landlord/Tenant, Family Consumer

Essex-Newark Legal Services

5 Commerce St., 2nd Floor, Newark 07102
 (973) 624-4500; Fax (973) 624-8745; enls@lsnj.org
 Exec. Dir.: Felipe Chavana; fchavana@lsnj.org
 Deputy Dir.: Jose Ortiz
 Managing Atty., Consumer Law: Carleton Lewis
 Managing Atty., Elder Law: Appointment Pending
 Managing Atty., Family Law: Aleida Piccini de Velazquez
Consumer Law, Elder Law, Family Law, Government Benefits & Housing Law

GLOUCESTER COUNTY**Community Health Law Project**

Atlantic, Camden, Cape May, Cumberland, Gloucester & Salem Counties
See Camden County

South Jersey Legal Services, Inc.

47 Newton Ave., Woodbury 08096
 (856) 848-5360; Fax: (856) 853-4259
 Managing Atty.: Connie M. Sailey, Ext. 6825; csailey@lsnj.org
 Staff Attys.:

Olatokunbo Emmanuel, Ext. 6564; oemmanuel@lsnj.org

Rebecca A. Preuss, Ext. 6830; rpreuss@lsnj.org

Andrew Vazquez-Schroedinger, Ext. 6832; avschroedinger@lsnj.org

Limited Civil Matters

HUDSON COUNTY**Community Health Law Project**

Union & Hudson Counties

See Union County

Northeast New Jersey Legal Services

Hudson County Division
 574 Summit Ave., Jersey City 07306
 (201) 792-6363; Fax: (201) 798-8780; nnjls@lsnj.org
 Exec. Dir.: John H. Fitzgerald; jfitzgerald@lsnj.org
 Dir. Of Litigation: Greg Diebold
Civil

HUNTERDON COUNTY**Legal Services of Northwest Jersey**

Hunerdon County
 82 Park Ave., Flemington 08822-1168
 (908) 782-7979; Fax: (908) 782-9761
lsnwj-hunterdon@lsnj.org; www.lsnj.org/lsnwj
 Managing Atty.: Alisa Grossman
Civil

MERCER COUNTY**Central Jersey Legal Services, Inc.**

Mercer County Division
 198 W. State St., Trenton 08608-1103
 (609) 695-6249; Fax: (609) 392-7952; www.lsnj.org/cjls
 Exec. Dir.: Janice Chapin; jchapin@lsnj.org
 Deputy Dir.: Susan J. Knispel; sknispel@lsnj.org
Civil

Community Health Law Project

Mercer & Burlington Counties

225 E. State St., Suite 5, Trenton 08608
 (609) 392-5553; Fax: (609) 392-5369; TTY: (609) 392-5369
trenton@chlp.org

Managing Atty.: Stacy Noonan

Also serves county of Burlington

MIDDLESEX COUNTY**Central Jersey Legal Services Inc.**

Middlesex County Division
 317 George St., Suite 201, New Brunswick 08901-2006
 (732) 249-7600; Fax: (732) 249-7966; www.lsnj.org/cjls
 Director: Janice Chapin; jchapin@lsnj.org
 Middlesex County Division-Perth Amboy Office
 313 State St., Room 308, Perth Amboy 08861-4117
 (732) 324-1613; Fax: (732) 324-6253; www.lsnj.org/cjls
 Managing Atty.: Russell Gale
Rutgers University
 Office of Student Legal Services
 Tillett Hall, Room 247, 53 Avenue E., Piscataway 08854-8040
 (848) 932-4529; sls@echo.rutgers.edu; rusls.rutgers.edu
 Director: Donald C. Heilman
Provides a wide range of services to Rutgers students

MONMOUTH COUNTY**Community Health Law Project**

Monmouth & Ocean Counties

1 Main St., Suite 413, Eatontown 07724

(732) 380-1012; Fax: (732) 380-1015; eatontown@chlp.org

Managing Atty.: Madeleine Coghlan

Also serves county of Ocean

Legal Aid Society of Monmouth County

2407 Rt. 66, Ocean 07712

Mailing Address: P.O. Box 2006, Asbury Park 07712

(732) 869-5619; legalaidsmonmouthcountynj@gmail.commonmouthlegalaid.com

Director: Valerie Hemhauser

*Civil Law***South Jersey Legal Services, Inc.**

303 W. Main St., 1st Floor, Freehold 07728

(732) 414-6750; Fax: (732) 414-6757

Managing Atty.: Alicia Williams, Ext. 6513; afwilliams@lsnj.org

Staff Attys.:

Justine Digeronimo, Ext. 6512; jdigeronimo@lsnj.orgCadence Hulme, Ext. 6521; chulme@lsnj.orgCassandra Stabbert, Ext. 6322; cstabbert@lsnj.orgTroy Torres, Ext. 6510; ttorres@lsnj.org

Asst. Pro Bono Coordinator:

Kristine Carranceja-Gurski, Ext. 6516; kcgurski@lsnj.org**MORRIS COUNTY****Legal Aid Society of Morris County***See Legal Services of Northwest Jersey***Legal Services of Northwest Jersey Morris County**

30 Schuyler PL, 2nd Floor, Morristown 07960

(973) 285-6911; Fax: (973) 605-8991

lsnwj-morris@lsnwj.org; www.lsnj.org/lsnwj

Managing Atty.: David M. Saltzman

*Civil***OCEAN COUNTY****Community Health Law Project**

Monmouth & Ocean Counties

*See Monmouth County***South Jersey Legal Services, Inc.**

215 Main St., Toms River 08753

(732) 608-7794; Fax: (732) 608-9636

Managing Atty.: Natasha McLaurin, Ext. 6565; nmclaurin@ls.org

Staff Attys.:

Christopher Benson, Ext. 6560; cbenson@lsnj.orgAshley Camporeale, Ext. 6567; amanto@lsnj.orgBenjamin J. D'Alessio, Ext. 6567; bdalessio@lsnj.org**PASSAIC COUNTY****Community Health Law Project**

Essex & Passaic Counties

*See Essex County***Northeast New Jersey Legal Services**

Passaic County Division

152 Market St., 6th Floor, Paterson 07505

(973) 523-2900; Fax: (973) 523-9002; nnjls@lsnj.org

Deputy Dir.: Leah Ashe

SALEM COUNTY**Community Health Law Project**

Atlantic, Camden, Cape May, Cumberland, Gloucester & Salem Counties

*See Camden County***South Jersey Legal Services, Inc.***See Cumberland County***SOMERSET COUNTY****Legal Services of Northwest Jersey Somerset County**

90 E. Main St., Somerville 08876-2312

(908) 231-0840; Fax: (908) 231-6780; lsnwj-somerset@lsnj.org;www.lsnj.org/lsnwj

C.E.O.: Michael L. Wojcik

Program Dir.: Andrea Strack

SUSSEX COUNTY**Legal Services of Northwest Jersey**

Sussex County

18 Church St., Suite 120, Newton 07860-1702

(973) 383-7400; Fax: (973) 383-3469

lsnwj-sussex@lsnj.org; www.lsnj.org/lsnwj

Managing Atty.: Victoria Reiners

UNION COUNTY**Central Jersey Legal Services, Inc.**

Union County Division

60 Prince St., Elizabeth 07208

(908) 354-4340; Fax: (908) 354-4361; www.lsnj.org/cjlsDeputy Dir.: Debbie Morgan; dmorgan@lsnj.org*Civil***Community Health Law Project**

Union & Hudson Counties

65 Jefferson Ave., Suite 402, Elizabeth 07201

(908) 355-8282; Fax: (908) 355-3724; TTY: (908) 355-3369; elizabeth@chlp.org;www.chlp.org

Managing Atty.: Meena J. Song

Also serves counties of Hudson, Union

*Limited Civil legal services for low-income disabled and elderly (Union only)***WARREN COUNTY****Legal Services of Northwest Jersey**

Warren County Division

91 Front St., Belvidere 07823-0065

(908) 475-2010; Fax: (908) 475-1719; lsnwj-warren@lsnj.orgwww.lsnj.org/lsnwj

Managing Atty.: Grace E. Kelly

SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, P.C.
By: Stuart A. Tucker, Esq., NJAID# 047561991
A Professional Corporation
Quakerbridge Executive Center
101 Grovers Mill Road, Suite 200
Lawrenceville, New Jersey 08648
T: 609-275-0400, F: 609-275-4511
Attorneys for Plaintiff, Sophia Caver

SOPHIA CAVER,

Plaintiff,

vs.

ROSS STORES, INC. d/b/a DD'S
DISCOUNTS, JOHN/JANE DOE 1-
100, ABC CORPORATION 1-100,
XYZ PARTNERSHIP 1-100,
SUPERVISORS 1-100, CUSTODIANS
1-100, representing one or
more fictitious individuals or
entities, individually,
jointly, and severally,
JOHN/JANE DOE 101-200, ABC
CORPORATION 101-200, XYZ
PARTNERSHIP 101-200,
representing one or more
fictitious persons or entities
consisting of Directors,
Officers, Principals,
Partners, Boards, Board
Members or Representatives, or
Agents, individually, jointly,
and severally,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - MERCER COUNTY

DOCKET NO:

Civil Action

COMPLAINT AND JURY DEMAND

Plaintiff, SOPHIA CAVER, residing at 169 Old Rose Street,
in the City of Trenton, County of Mercer and State of New Jersey
08618, by way of Complaint states:

IDENTIFICATION OF THE PARTIES

1. Plaintiff, SOPHIA CAVER, resides at 169 Old Rose Street, in the City of Trenton, County of Mercer and State of New Jersey 08618.

2. Defendant, ROSS STORES, INC. d/b/a DD'S DISCOUNTS, is a corporation organized under the laws of the State of Delaware, with principle place of business at 5130 Hacienda Drive, in the City of Dublin, County of Alameda and State of California, 94568. Said Defendant conducts business at 1536 N. Olden Avenue, Space 14, in the City of Trenton, County of Mercer and State of New Jersey 08638, where Plaintiff, SOPHIA CAVER, was caused to slip and fall. Said Defendant may be served in the care of registered agent, The Corporation Trust Company, 820 Bear Tavern Road, City of West Trenton, County of Mercer, and State of New Jersey 08628.

FIRST COUNT - NEGLIGENCE

3. Plaintiff repeats the allegations contained in this complaint and makes same part of this count as if fully set forth herein.

4. At all times set forth herein, the property located at 1536 N. Olden Avenue, Space 14, in the City of Trenton, County of Mercer and State of New Jersey 08638, was owned, operated, inspected, maintained, and controlled by the Defendant, ROSS STORES, INC. d/b/a DD'S DISCOUNTS.

5. On or about the 22nd day of July 2019, Plaintiff, SOPHIA CAVER, was lawfully present and an invitee on the property owned by Defendant, ROSS STORES, INC. d/b/a DD'S DISCOUNTS.

6. Plaintiff, SOPHIA CAVER, was caused to fall and be injured due to the negligence of the Defendant.

7. At all times set forth herein, Defendant, ROSS STORES, INC. d/b/a DD'S DISCOUNTS, was under a contractual agreement and/or was otherwise obligated to keep the property in question in a safe, hazard free condition, exercise proper care, supervise, hire, train, and retain the persons, members, licensees, employees, supervisors, custodians, and/or agents who perform maintenance and care of the property, provide proper safeguards and/or warnings on this property, and provide proper, safe, and clear access and supervision for persons allowed and invited to use the property.

8. Defendant, ROSS STORES, INC. d/b/a DD'S DISCOUNTS, was negligent in that they failed to keep the property in a safe, hazard free condition, exercise proper care, supervise, hire, train, and retain persons, members, licensees, employees, supervisors, custodians, and/or agents tasked with performing the maintenance and care of the property, exercise proper care, provide proper safeguards and/or warnings on this property, provide proper, safe, and clear access of ingress and egress for

persons allowed, expected, and invited to use the property, maintain the premises, prevent a nuisance from existing, and was otherwise negligent in the maintenance and supervision of the premises and invitees.

9. As a result of the negligence of Defendant, ROSS STORES, INC. d/b/a DD'S DISCOUNTS, Plaintiff, SOPHIA CAVER, was caused to suffer and sustain severe and disabling injuries, and has been and will in the future be caused to obtain medical treatment, and has been and will in the future be caused to refrain from normal pursuits.

WHEREFORE, Plaintiff, SOPHIA CAVER, demands judgment, against the Defendants, ROSS STORES, INC. d/b/a DD'S DISCOUNTS, for:

- A. General damages;
- B. Compensatory damages;
- C. Cost and interest;
- D. Attorney's fees;
- E. Any other relief the Court deems just and equitable.

SECOND COUNT - NEGLIGENCE (Fictitious Defendants)

10. Plaintiff repeats the allegations contained in this complaint and make same part of this count as if fully set forth herein.

11. At all times hereinafter mentioned, Defendants, JOHN/JANE DOE 1-100, ABC CORPORATION 1-100, XYZ PARTNERSHIP 1-

100, SUPERVISORS 1-100, CUSTODIANS 1-100, representing one or more fictitious individuals or entities, individually, jointly, and severally, JOHN/JANE DOE 101-200, ABC CORPORATION 101-200, XYZ PARTNERSHIP 101-200, representing one or more fictitious persons or entities consisting of Directors, Officers, Principals, Partners, Boards, Board Members or Representatives, or Agents, individually, jointly, and severally, operated, maintained, controlled, managed, constructed, supervised maintenance, and designed the premises identified as 1536 N. Olden Avenue, Space 14, in the City of Trenton, County of Mercer and State of New Jersey 08638, where Plaintiff, SOPHIA CAVER, was caused to have fallen and suffered injuries which are the subject of this lawsuit.

12. At all times hereinafter mentioned, Defendants, JOHN/JANE DOE 1-100, ABC CORPORATION 1-100, XYZ PARTNERSHIP 1-100, SUPERVISORS 1-100, CUSTODIANS 1-100, representing one or more fictitious individuals or entities, individually, jointly, and severally, JOHN/JANE DOE 101-200, ABC CORPORATION 101-200, XYZ PARTNERSHIP 101-200, representing one or more fictitious persons or entities consisting of Directors, Officers, Principals, Partners, Boards, Board Members or Representatives, or Agents, individually, jointly, and severally,, were negligent in that they failed to keep the property in a safe, hazard free condition, exercise proper care, supervise, hire, train, and

retain persons, members, licensees, employees, and/or agents tasked with performing the maintenance and care of the property, exercise proper care, provide proper safeguards and/or warnings on this property, provide proper, safe, and clear access of ingress and egress for persons allowed, expected, and invited to use the property, maintain the premises, prevent a nuisance from existing, and were otherwise negligent in the maintenance of the premises.

13. At all times hereinafter mentioned, Defendants, ROSS STORES, INC. d/b/a DD'S DISCOUNTS, JOHN/JANE DOE 1-100, ABC CORPORATION 1-100, XYZ PARTNERSHIP 1-100, SUPERVISORS 1-100, CUSTODIANS 1-100, representing one or more fictitious individuals or entities, individually, jointly, and severally, was acting as an agent, servant, and/or employee of Defendant, ROSS STORES, INC. d/b/a DD'S DISCOUNTS, JOHN/JANE DOE 101-200, ABC CORPORATION 101-200, XYZ PARTNERSHIP 101-200, representing one or more fictitious persons or entities consisting of Directors, Officers, Principals, Partners, Boards, Board Members or Representatives, or Agents, individually, jointly, and severally.

14. As a result of the carelessness, recklessness, and negligence of Defendants, ROSS STORES, INC. d/b/a DD'S DISCOUNTS, JOHN/JANE DOE 1-100, ABC CORPORATION 1-100, XYZ PARTNERSHIP 1-100, SUPERVISORS 1-100, CUSTODIANS 1-100,

representing one or more fictitious individuals or entities, individually, jointly, and severally, JOHN/JANE DOE 101-200, ABC CORPORATION 101-200, XYZ PARTNERSHIP 101-200, representing one or more fictitious persons or entities consisting of Directors, Officers, Principals, Partners, Boards, Board Members or Representatives, or Agents, individually, jointly, and severally, Plaintiff, SOPHIA CAVER, was caused to suffer and sustain severe, disabling, and permanent injuries, and has and will in the future be caused to obtain medical treatment, and has been and will in the future be caused to refrain from normal pursuits.

WHEREFORE, Plaintiff, SOPHIA CAVER, demands judgment against Defendants, ROSS STORES, INC. d/b/a DD'S DISCOUNTS, JOHN/JANE DOE 1-100, ABC CORPORATION 1-100, XYZ PARTNERSHIP 1-100, SUPERVISORS 1-100, CUSTODIANS 1-100, representing one or more fictitious individuals or entities, individually, jointly, and severally, JOHN/JANE DOE 101-200, ABC CORPORATION 101-200, XYZ PARTNERSHIP 101-200, representing one or more fictitious persons or entities consisting of Directors, Officers, Principals, Partners, Boards, Board Members or Representatives, or Agents, individually, jointly, and severally, for:

- A. General damages;
- B. Compensatory damages;
- C. Cost and interest;

- D. Attorney's fees;
- E. Punitive Damages;
- F. Any other relief the Court deems just and equitable.

CERTIFICATION

PLEASE TAKE NOTICE pursuant to the provisions of R.4:5-1, the undersigned attorney certifies that this matter is not the subject of any other action pending in any court or arbitration proceeding, nor is any other action or arbitration proceeding contemplated, and all known necessary parties have been joined in this action.

NOTICE PURSUANT TO RULES 1:5-1(a) AND 4:17-4(c)

PLEASE TAKE NOTICE that the undersigned attorney, counsel for Plaintiff, hereby demands pursuant to R. 1:5-1(a) and R. 4:17-4(c), that each party herein serving pleadings and interrogatories and receiving answers thereto, serve copies of all such pleadings and answered interrogatories received from any party, including any documents, papers and other materials referred to therein, upon the undersigned attorney, and take notice that this is a continuing demand.

DEMAND FOR ANSWERS TO INTERROGATORIES

PLEASE TAKE NOTICE pursuant to R.4:17-1(b), Plaintiff hereby demands that Defendants provide answers to the uniform Interrogatories set forth in Form C and Form C(1) of Appendix II of the Rules Governing the Courts of the State of New Jersey.

DEMAND FOR ANSWERS TO SUPPLEMENTAL INTERROGATORIES

PLEASE TAKE NOTICE pursuant to R.4:17, Plaintiff hereby demands that the Defendants provide answers to the Supplemental Interrogatories attached herein.

DEMAND TO ANSWER NOTICE TO PRODUCE

PLEASE TAKE NOTICE pursuant to R.4:18-1, Plaintiff hereby requests that the Defendants respond to the Notice to Produce attached herein within the time prescribed by the Court Rules.

DEMAND FOR DISCOVERY OF INSURANCE

PLEASE TAKE NOTICE pursuant to R.4:10-2(b) demand is hereby made that Defendants respond to the Request for Discovery of Insurance attached herein.

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that attorney, Stuart A. Tucker, Esq., is hereby designated as trial counsel in the above captioned litigation for the firm of SZAHERMAN, LAKIND, BLUMSTEIN & BLADER, P.C.

JURY DEMAND

PLEASE TAKE NOTICE that Plaintiff hereby demands a trial by jury as to all issues so triable.

NOTICE PURSUANT TO R.1:7-1(b)

PLEASE TAKE NOTICE Plaintiff intends to utilize the time-unit basis for calculating unliquidated damages in Plaintiff's closing statement to the jury and the Court.

**NOTICE OF DISCOVERY DEPOSITIONS SUBJECT
TO AUDIOVISUAL RECORDING PURSUANT TO R.4:14-1, ET SEQ.**

PLEASE TAKE NOTICE, that in accordance with the Rules Governing the Courts of the State of New Jersey, Pursuant to R.4:14-1, et seq., each discovery deposition conducted shall be subject to audiovisual recording pursuant to R.4:14-9. This notice is being served in accordance with R.4:14-2(a) and R.4-14-9(b).

**SZAFERMAN, LAKIND,
BLUMSTEIN & BLADER, P.C.**
Attorneys for Plaintiff

By: 
Stuart A. Tucker, Esq.

Dated: 7-13-21